

# Defendant's Failure to Follow The Court's Instructions

U.S. District Court  
Northern District of Texas (Dallas)

Willie Lee HavMmeri,  
Plaintiff  
vs.  
Methodist Health Systems,  
Defendant

Case No. 3:22-cv-00594-E-BT

Assigned Judge: Ada Brown  
Magistrate Judge: Rebecca Rutherford  
Defendant's Legal Team: Ogletree Deakins Nash Smoak & Stewart PC  
(Employment Law Firm – Dallas, Texas)  
Cause: 42:1983 Civil Rights (Employment Discrimination)  
Nature of Suit: 442 Civil Rights: Employment  
Date Filed: 03/14/2022  
Today's Date: 05/09/2023

## Overview

"Parties must submit proposed orders via the Court's ECF System." (Ordered by Magistrate Judge Rebecca Rutherford on 11/9/2022)

The Defendant's legal actions are hypocritical. The Defendant currently has the Court reviewing a Motion to Dismiss (doc. 33) on the grounds that I failed to follow the Courts instructions to deliver an Amended Complaint by October 31<sup>st</sup> 2020, stating that my document 24 titled "Amended Complaint" is not an "Amended Complaint.

## Proposed Order \*MUST\* be submitted through ECF System, per Judge's Instructions

Not only does this Motion to Dismiss on the grounds stated seem ridiculous, the Defendant has failed to follow the Court's instructions themselves by sending a word document via email to the Judge after being INSTRUCTED not to do so in the future.

On November 9<sup>th</sup> 2022, via electronic order, the Courts instructed all parties to submit orders via the ECF system in an official document on record (Electronic Order – doc. 32).

The very next day November 10<sup>th</sup> 2022, the Defendant failed to follow the Court's Instructions and sent an email with a proposed order to the Judge in this case, stating that my case should be dismissed because \*I\* did not follow the Court's Instructions.

On November 15th 2022, in an emailed reply, the Court \*AGAIN\* instructed the Defendant, it's legal team and myself, as the Plaintiff, that "Parties must submit proposed orders via the Court's ECF System".

Today is May 9, 2023 and the Defendant maintains a position of emailing word documents directly to the Judge, to which the Judge has given detailed instruction NOT TO DO SO on several occasions, informing both parties of the lack of safeguards associated with emailed delivery for proposed orders.

**The email sent today May 9, 2023 was courtesy of Yolanda Bables of Ogletree Deakins Nash Smoak & Stewart PC at 5:01pm.**

With that said, I find it quite hypocritical (and a bit comical) that in the Defendant's time consuming/wasting Motion to Dismiss, I am accused of failing to follow the Court's Instructions when the Defendant has demonstrated repeatedly an unwillingness to do so.

### **Conclusion**

November 9<sup>th</sup> 2022, via Electronic Order (doc- 32), The Court instructed both parties in the manner in which to deliver proposed orders and the very next day (November 10<sup>th</sup> 2022) the Defendant filed a Motion to Dismiss, citing erroneously that I failed to follow the Court's Instructions. This has wasted 6 months of the Court's time. These are the professionals.

Exhibits attached below

**My termination was WRONGFUL. It was RETALIATION for questioning an unfair bias, due to GENDER.**

**I am more than a name in the PLAINTIFF section of documents.**

Respectfully submitted,

May 9th, 2023

By: /s/ Willie HavMmeri

Willie Lee HavMmeri, self-represented "Pro se"  
godcolored@gmail.com  
(214) 600-6207

## Exhibits

Exhibits of failure to follow the Court's Instructions by Ogletree Deakins Nash Smoak & Stewart PC (Defendant's Legal team)

The screenshot shows an email inbox with the following messages:

- Case No.**  
3:22-cv-00594-E-BT;  
HavMmeri v. Methodist  
Health Systems -  
Document No. 33,  
"Defendant's Motion  
to Dismiss and Brief in  
Support" [ODNSS-O  
GL.039078.000017]
- Bables, Yolanda** 11/10/2022  
Dear Judge Rutherford: Attached  
is a proposed Order to be used
- Rutherford Orders** 11/15/2022  
Parties must submit proposed  
orders via the Court's ECF System.
- Bables, Yolanda** 11/15/2022  
to Rutherford, me, Bar... ▾

Red arrows point from the text "Attached is a proposed Order to be used" and "Parties must submit proposed orders via the Court's ECF System." to the message from Yolanda Bables.

**Bables, Yolanda** 5:01 PM  
to Rutherford\_Orders... ▾

Dear Judge Rutherford:

Attached is a proposed Order in Word to be used in consideration with the Response referenced above. Thank you.

**Yolanda Bables, LTC4 Technology Certified | Practice Assistant | Ogletree Deakins**  
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